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**DEPARTMENT OF THE ARMY  
U.S. Army Corps of Engineers  
Washington, D.C. 20314-1000**

EP 200-1-2

Pamphlet  
No. 200-1-2

28 April 2000

**Environmental Quality  
PROCESS AND PROCEDURES FOR RCRA MANIFESTING**

**1. Purpose.** The enclosed appendix is a guide to the procedures and responsibilities primarily associated with the manifesting of hazardous wastes in accordance with the requirements of the Resource Conservation and Recovery Act and the Department of Transportation regulations. In addition the pamphlet sets forth procedures for the transportation of hazardous materials, Formerly Utilized Sites Remedial Action Program (FUSRAP) wastes, and other wastes commonly transported by the Corps of Engineers during site remediation.

**2. Applicability.** This pamphlet applies to all HQUSACE elements, all USACE commands having the responsibility for executing and signing hazardous waste manifests and all USACE elements responsible for overseeing contractors who prepare hazardous materials for shipment and then sign and execute manifests and other shipping papers.

**3. Distribution Statement.** Approved for public release, distribution is unlimited.

**4. References.**

- a. 49 U.S.C. 5101, et seq., as amended, Hazardous Materials Transportation Act.
- b. 42 U.S.C. 6901, et seq., as amended, Resource Conservation and Recovery Act (RCRA).
- c. 42 U.S.C. 9601, et seq., as amended, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- d. 28 U.S.C. 2679, et seq., as amended, Federal Employee's Liability Reform and Tort Compensation Act.
- e. PL 102-386, Federal Facility Compliance Act, amendment to RCRA.
- f. 40 CFR 61, 260-280, 761, EPA asbestos, hazardous waste, and PCB regulations.

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This EP supersedes EP 200-1-2 dated 31 March 1994.

g. 40 CFR 300 – 302, EPA National Contingency Plan and Reportable Quantity regulations.

h. 49 CFR 171-180, DOT hazardous materials transportation regulations.

i. EP 415-1-266, Resident Engineers Management Guide for HTRW Sites.

j. EP 500-1-1, Emergency Employment of Army and Other Resources.

**5. Discussion.** The transportation of hazardous materials in the United States is strictly regulated by the U.S. Department of Transportation (DOT). Hazardous wastes are one subset of hazardous materials. The transportation of hazardous waste is strictly regulated by the U.S. Environmental Protection Agency (EPA) as well as the U.S. Department of Transportation (DOT). EPA requires the use of a specific shipping document called the "Uniform Hazardous Waste Manifest." EPA defers to DOT in the actual physical shipping of the wastes. The DOT has approximately 1700 pages of requirements discussing the proper shipping requirements for hazardous materials, including wastes and has requirements that each shipment be properly labeled, packaged, marked and that all transport vehicles be properly placarded. DOT and EPA regulations together form the basis for the transportation of hazardous wastes. While not hazardous wastes, EPA does require manifests for shipments of Polychlorinated Biphenyls (PCBs). For asbestos, EPA requires the use of a form called an Asbestos Waste Shipping Record. For both PCBs and asbestos, the DOT requirements must be fulfilled, as both asbestos and PCBs are DOT regulated hazardous materials.

**6. Updates.** This document was originally published on 31 March 1994. It has been updated to include specific EPA and DOT regulatory changes. In addition, the update provided in the appendix reflects the most current USACE policy and guidance pertaining to the shipping of hazardous materials, hazardous wastes, PCBs, asbestos, ordnance and explosive wastes (OE), and low level radioactively contaminated soils from FUSRAP sites. Specifically some of the more important updates are identified below:

- a. Update of entire manual based on EPA and DOT regulatory changes;
- b. Extensive cross reference to the revised requirements found in EP 415-1-266, Resident Engineers Management Guide for HTRW Sites;
- c. Identification of responsibilities associated with signing manifests and other shipping documents for OE sites (page A-53 of revised document);
- d. Identification and explanation of the EPA Off-Site Rule (page A-55);
- e. Identification of the new requirement to use a Certificate of Disposal for placement of all site remediation wastes offsite and commercial treatment, storage, or disposal facilities as per EP 415-1-266 (page A-59);

f. Identification of the new requirement to use a Chain-of-Custody example form for the offsite transportation of all FUSRAP wastes that are not EPA or DOT regulated during the course of transportation as required by EP 415-1-266 (page A-81 and A-82);


g. Identification of the new requirements to affix a non-DOT specification communication label to all shipments of FUSRAP wastes (page A-65);

h. Changes in recordkeeping requirements as per MARKS update (page A-55);  
and

i. Revisions to all EPA and DOT checklists (pages A-68 though A-80).

**FOR THE COMMANDER:**

1 Appendix  
App A- Process and  
Procedures for RCRA  
Manifesting

  
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